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CERTIFIED MAIL

May 5, 2007

Document Processing Center (7407M)
EPA EAST - Room 6428
Office of Pollution Prevention and Toxics
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington DC 20460-0001

Attention: TSCA 8(e) Coordinator

RE: t-Butyl Acetate – Oral Developmental Toxicity Study in Mated Female Rats (WIL-14069)

Dear Sir or Madam:

Lyondell Chemical Company (Lyondell) hereby submits this letter pursuant to Section 8(e) of the Toxic Substances Control Act (TSCA) and EPA's 1991 Section 8(e) Reporting Guide because it includes findings that EPA may consider reportable. In an oral developmental toxicity study of tertiary butyl acetate (tBAC) in mated female rats, the following was observed:

1. Adverse clinical signs (hypoactivity, lurching when walking, splayed hindlimbs, prostration, body drags when walking, impaired use of hindlimbs, walks on tiptoes, hunched posture, retropulsion, circling) were noted in dams following oral administration of 800, 1000, or 1600 mg/kg bw/day tert-butyl acetate. The presence of these clinical signs suggested an effect on the central nervous system and resolved within two hours of dose administration. In addition, the animals developed a tolerance to the chemical as the presence of the clinical signs were reduced with repeeated daily administration of the chemical.

2. A decrease in fetal body weights at the 1000 mg/kg/day exposure level was noted at necropsy.

This study was conducted by WIL Research Laboratories, LLC for Lyondell.

A copy of the study final report will be forwarded upon its availability.

Should you have any questions or require additional details, please do not hesitate to call me at 713-309-7791, FAX at 713-951-1574 or by e-mail at betsy.duncan@lyondellbasell.com.

Sincerely,

Betsv Duncan

Betsy Juncan

Business Consultant – Global Chemical Control Regulatory Corporate TSCA Coordinator Lyondell Chemical Company

Cc: TSCA 8(e) Files

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